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Attorneys for Defendants and Counterclaimants  
**XINGKE ELECTRONICS (DONGGUAN) CO., LTD.**,  
 formerly known as **SINCO ELECTRONICS**  
**(DONGGUAN) CO., LTD.**, **LIEW YEW SOON** aka,  
**MARK LIEW**, **NG CHER YONG**. aka **CY NG**, and **MUI**  
**LIANG TJOA** aka **ML TJOA**

**UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

**SINCO TECHNOLOGIES PTE LTD.,**

Plaintiff,

v.

**SINCO ELECTRONICS (DONGGUAN)**  
**CO., LTD.**; **XINGKE ELECTRONICS**  
**(DONGGUAN) CO., LTD.**, **XINGKE**  
**ELECTRONICS TECHNOLOGY CO.,**  
**LTD.**, **SINCO ELECTRONICS**  
**TECHNOLOGY CO., LTD.**, **MUI LIANG**  
**TJOA** (an individual), **NG CHER YONG** aka  
**CY NG** (an individual), and **LIEW YEW**  
**SOON** aka **MARK LIEW** (an individual),

Defendants.

Case No. 3:17-cv-05517-EMC

Action Filed: September 22, 2017

**ADMINISTRATIVE MOTION AND  
 MOTION FOR ORDER TO SEAL  
 DOCUMENTS IN SUPPORT OF  
 DEFENDANTS' OPPOSITION TO  
 PLAINTIFF SINCO TECHNOLOGIES  
 PTE LTD'S MOTION TO STRIKE AND  
 TO PRECLUDE TESTIMONY**

Date: May 6, 2021

Time: 1:30 p.m.

Place: Courtroom 5, 17<sup>th</sup> Floor (via Zoom)

Judge: **Honorable Edward M. Chen**

Pursuant to Local Rules 7-11 and 79-5, Defendants, through their attorneys of record, move for a Court order allowing the filing under seal of: (1) portions of Defendants' Opposition to Plaintiff SinCo Technologies Pte Ltd's Motion to Strike the Expert Report of Defendants' Damages Expert Henry Kahrs and to Preclude Mr. Kahrs and Adrian Fleissig From Testifying at Trial, (2) Alan Cox's Expert Report dated January 9, 2020, appended as Exhibit A to the Declaration of Kathleen Alparce, (3) excerpts from the deposition of Henry Kahrs taken on February 4, 2020, appended as Exhibit B to the Declaration of Kathleen Alparce, (4) excerpts from the deposition of Alan Cox taken on February 5, 2020, appended as Exhibit C to the Declaration of Kathleen Alparce, and (5) the Declaration of Henry J. Kahrs in support of Defendants' Opposition dated April 9, 2021 to Plaintiff SinCo Technologies Pte Ltd's Motion to Strike the Expert Report of Defendants' Damages Expert Henry Kahrs and to Preclude Mr. Kahrs and Adrian Fleissig From Testifying at Trial.

This motion will be made on the grounds that the parties have stipulated to a protective order, and the attached materials have been designated as confidential by a party; and in addition, the attached materials include trade secret information and/or information one or more of the parties are otherwise contractually obligated to maintain as confidential.

This motion will be based upon this notice, the attached Memorandum of Points and Authorities, the concurrently filed declaration of Kathleen Alparce, as well as all of the evidence properly before the court.

DATED: April 9, 2021

WHGC, P.L.C.

By: /s/ Kathleen E. Alparce  
 Jeffrey C.P. Wang  
 Kathleen E. Alparce  
 Jessica A. Crabbe

Attorneys for Defendants and Counterclaimants  
 XINGKE ELECTRONICS (DONGGUAN) CO.,  
 LTD., formerly known as SINCO ELECTRONICS  
 (DONGGUAN) CO., LTD., LIEW YEW SOON aka,  
 MARK LIEW, NG CHER YONG. aka CY NG, and  
 MUI LIANG TJOA aka ML TJOA

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served a copy of the foregoing **ADMINISTRATIVE MOTION AND MOTION FOR ORDER TO SEAL DOCUMENTS IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF SINCO TECHNOLOGIES PTE LTD'S MOTION TO STRIKE AND TO PRECLUDE TESTIMONY** via the Court's CM/ECF system on April 9, 2021.

/s/ Martha Valenzuela